



THE METROPOLITAN WATER DISTRICT  
OF SOUTHERN CALIFORNIA

Office of the General Manager

December 2, 2015



Delivered by email to: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

The Honorable Felicia Marcus, Chair  
And Members of the State Water Resources Control Board  
c/o Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

**Subject: Comment Letter – Urban Water Conservation Workshop**

Dear Chair Marcus and Members of the Board,

The Metropolitan Water District of Southern California (Metropolitan) appreciates the opportunity to comment on the potential extension and modification of the Emergency Regulation for Statewide Urban Water Conservation. Metropolitan supports SWRCB's leadership in implementing the Governor's Executive Order for all Californians to increase water conservation, while granting control and flexibility to local water agencies to implement the most effective measures to achieve that goal.

Metropolitan serves about 19 million people, approximately half of the state's population, through its 26 member agencies. About 140 retail urban water suppliers serve within Metropolitan's six southern California counties. Through five months of performance under the current Emergency Regulation it is clear that Southern Californians have taken this mandate seriously and are reducing water use during this severe drought.

Metropolitan recognized the urgency to establish and implement the Emergency Regulation, that was adopted by the SWRCB on May 5, 2015. California was facing another year of record drought and it was clear that water supplies on the Central Valley Project and State Water Project systems would be very low. It was also important to put regulations in place in time to impact the higher water use months of the summer. However, while the current regulations are in effect through February of 2016, there is some time to take thoughtful consideration of factors that were not incorporated into the initial regulations. As you consider the extension and modification of the Emergency Regulation, Metropolitan requests SWRCB to incorporate the following recommendations:

**1. Monitor and assess the ongoing water supply outlook on a monthly basis and re-evaluate the need and depth of water use reductions in May 2016**

It now appears that record warm Pacific Ocean temperatures have created an El Nino condition that could bring a welcome change to the current dry weather pattern. While a wet water year is not

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assured, it does create a potential communication challenge with the public that has done so much to help California manage through the drought by reducing water use. The call for continuing the emergency conservation regulations, should be assessed if winter storms bring a wetter hydrology to California. The winter hydrology and water supply condition for various regions in the state vary rapidly throughout the months of January through April. We request that SWRCB monitor and assess the water supply conditions and outlook for the state and the different regions within California on a monthly basis during this period. Extending the conservation regulation only through April would allow SWRCB to evaluate the winter's impact on supply conditions before making a decision on the need and depth of water use reductions for the summer months and beyond. If emergency conditions no longer persist, then the emergency conservation regulation would not need to be extended.

The following parameters are examples the SWRCB may consider and monitor in determining the seriousness of the statewide drought emergency and need for extending mandatory water use reductions:

- The Northern Sierra 8-station and the San Joaquin 5-station precipitation indices
- Monthly California Cooperative Snow Surveys
- DWR Bulletin 120 Runoff Forecasts and runoff to date
- State Water Project and Central Valley Project allocation studies and updates

## **2. Adjust the Emergency Regulation to consider local factors that enhance the equitable implementation of water use reduction targets**

To ensure supply reliability under drought conditions, Metropolitan and its member agencies have made significant investments in drought-proof local supplies. The state should encourage and incentivize local agencies to continue making these kinds of investments. A mandatory water use reduction without considering production of these drought-proof supplies may be viewed as a disincentive. Similarly, an approach that does not recognize variability in local climate factors or demographic/economic growth trends could be viewed as punitive.

We encourage the SWRCB to consider the following factors when adjusting the Emergency Regulation:

- Local weather and climate
- Population and economic growth
- Investments and production of drought-proof local supplies
- Conservation implementation

Metropolitan's Water Supply Allocation Plan (WSAP) includes similar factors when establishing water use reductions. Although the primary purpose of Metropolitan's WSAP is to allocate water supplies to our member agencies, its underlying principles seek to ensure that the allocations of water supplies have an equitable impact to the retail water consumers within Metropolitan's service area.

Californians need further advancement towards efficient water use through public outreach and education, improvements in technologies, and implementation of effective water policies and regulations. Metropolitan appreciates the SWRCB's effort to enforce mandatory cutbacks of water use during the current emergency drought condition, but this is not an effective model to achieve long-term reductions in non-emergency conditions. Metropolitan is ready to work with SWRCB and other state agencies in

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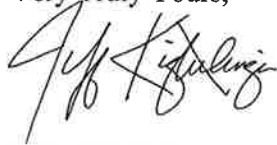
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devising long-term, non-emergency water policies and regulations to make further gains with water use efficiency.

I appreciate your consideration of our recommendations. Please contact me for any questions or further discussions.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Jeff Kightlinger". The signature is written in a cursive, flowing style.

Jeffrey Kightlinger